

97-A49



Department of Energy
Western Area Power Administration
Sierra Nevada Customer Service Region
114 Parkshore Drive
Folsom, California 95630-4710

OCT 14 1997

October 7, 1997

Mr. Lester Snow
CALFED
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

The Western Area Power Administration (Western) is concerned with the current direction the CALFED process is taking with respect to impact modeling for the Central Valley Project (CVP) hydroelectric power resources. Western, as a cooperating agency working on the CALFED Programmatic Environmental Impact Report/Statement (EIR/EIS), has been tracking the power production analysis being performed by your staff.

We have attended both Hydrology and Water Management Impact Analysis Team and Economic Impact Analysis Team meetings to monitor the work being completed with regard to power impacts. Recently we received a draft copy of the Affected Environment and Environmental Impacts for Power Production Economics, dated September 1997 for review. The draft report was made available by CALFED on September 10, but we did not receive a copy until September 18. Comments were due to Mr. Frank Piccolo on September 29. We apologize for not making the deadline, but six working days was not enough time for us to perform a thorough review of the report. Western intended to submit a letter to Mr. Piccolo transmitting our specific comments on the draft report. After reviewing the document, we now feel it is appropriate to write directly to you to convey our immediate concern with the characterization of the power analyses performed to date.

First, from a power perspective, it must be understood that the State Water Project (SWP) and the CVP are not similar projects. The SWP is a huge power consumer. The CVP is a net power producer. As this is the case, Western feels it is imperative that the two projects be split. All CVP power generated in excess of the power required to run CVP project facilities (Project Use) is available for sale to the CVP preference power customers and other entities. To "lump" both projects together may incorrectly cause the reader to infer there is no "net" power available for sale.

Western is especially concerned that the reader may interpret the information to mean that the CVP power resources will be used to support SWP energy requirements resulting in no commercial power to be available for sale. Each project has its own unique set of operational parameters. Combining them completely eliminates the ability to measure project-specific impacts. Figure 4, on page 11 of the Affected Environment report graphically depicts the problem--the SWP's energy requirements

overwhelm the CVP's surplus power benefits. In order for CALFED to adequately evaluate the impacts as required by NEPA and CEQA, the two projects must be separated. This document, in conjunction with others, will be used by the decision maker to identify the probable impacts and/or benefits when choosing a preferred alternative and ultimately a record of decision. The potential exists for significant impacts to CVP power resources to be overlooked if the two projects are combined and represented as one.

This July Western representatives met with CALFED staff to discuss how the CVP would be evaluated for the EIR/EIS. At that time we offered our services to perform the impact analysis for the CVP power resources. Also at that time, we stated our concern with the use of DWRSIM as an inappropriate analytical tool for CVP power production analysis. We continue to believe that the model does not properly represent the CVP features (particularly the Project Use load requirements) nor adequately evaluate the CVP power resource. It has been particularly distressing to attend meetings and feel your concerns and questions are not being considered as contributing to the development of the EIR/EIS. Specifically, our concerns have been voiced at both public meetings and Impact Analysis Team meetings, but changes are not made. Our comments are "noted". What does "noted" mean?

We are concerned that the knowledgeable public following the CALFED process and the CVPIA Programmatic EIS processes will know there is another analytical tool available that does adequately represent the CVP water and power facilities. Rather than always explaining DWRSIM's imperfections, Western suggests CALFED reevaluate its decision to eliminate the use of PROSIM as an appropriate analytical tool or determine if DWRSIM can be modified to more reasonably reflect the CVP power resources. Working together, we may develop a better analysis and hence develop a better environmental document.

A short list of our concerns and comments on the draft documents is attached. We will be happy to expand upon these comments and discuss additional concerns with the CALFED staff at their earliest convenience. In addition, Western requests a meeting with you specifically to discuss our major concern expressed in this letter. We are very aware of the imminent deadline for a draft EIR/EIS, but at the same time it is our duty to achieve an accurate portrayal of the CVP power resource impacts in the draft EIS/EIR.

As a cooperating agency, Western has the opportunity to develop a supplemental analysis for the EIR/EIS and publish it coincident with the release of the draft EIR/EIS. Internal discussions are currently underway to decide what avenue would be best for us. It is our desire to work with CALFED staff to reach a power production analysis that is acceptable to all participants. We await your response. Should you have any questions or concerns, I may be reached at (916) 353-4534.

Sincerely,



P. Nannette Engelbrite
Special Projects Engineer

Attachment

cc with attachment:

Mr. John Johannis, USBR, MP-180, Sacramento, CA

Mr. Frank Piccolo, CALFED, Sacramento, CA